

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
FAYETTEVILLE DIVISION
CASE NO.: 17-04095-5-JNC

IN RE:)
)
) CHAPTER 13
RHONDA FLANAGAN)
Debtor(s) .)
_____)

DEBTOR'S OBJECTION TO NOTICE OF ADDITIONAL POST-PETITION MORTGAGE
FEES, EXPENSES AND CHARGES FOR CLAIM #5 FOR U. S. BANK TRUST
NATIONAL ASSOCIATION et al. c/o BSI FINANCIAL SERVICES

Now comes the attorney for the Debtor(s), hereby objecting to the Notice of Intention to Pay Additional Post-Petition Mortgage Fees, Expenses and Charges filed on February 2, 2018 for \$300.00 for a Plan Review.

This the 5th day of January, 2020.

/s/ Chad W. Hammonds
Chad W. Hammonds
Attorney for Petitioner
3410 Capuano Road
Lumberton, NC 28360
(910) 608-3425
State Bar No. 21027

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
FAYETTEVILLE DISTRICT**

IN THE MATTER OF:

CASE NO.: 17-04095-5-JNC

RHONDA FLANAGAN

CHAPTER 13

NOTICE OF OBJECTION AND CERTIFICATE OF SERVICE

TO: THE CREDITOR(S), TRUSTEE AND OTHER PARTIES IN INTEREST

NOTICE IS HEREBY GIVEN of the Debtor(s) Objection to the Intention to Pay Additional Post-Petition Mortgage Fees, Expenses and Claims;

FURTHER NOTICE IS HEREBY GIVEN that if you fail to respond or otherwise plead or request a Hearing in writing within fourteen (14) days from the date of this Notice, the relief requested in the Motion may be granted without further Notice or Hearing; and

FURTHER NOTICE IS HEREBY GIVEN that if a Response and a Request for a Hearing is filed by the Trustee, or other parties in interest named herein writing within the time indicated, a Hearing will be conducted on the Motion and Response thereto at a date, time and place to be later set by the Court and all interested parties will be notified accordingly.

DATE OF NOTICE: January 5, 2020.

/s/Chad W. Hammonds
Chad W. Hammonds
Attorney for Debtor(s)
3410 Capuano Road
Lumberton, NC 28360
State Bar No.: 21027

CERTIFICATE OF SERVICE

I, Chad W. Hammonds, Attorney at Law, certify:

That on January 5, 2020 I served a copy of the foregoing Objection on the following parties to this action by depositing a copy in the United States mail bearing sufficient postage or electronically as indicated:

Joseph A. Bledsoe III (via CM/ECF)
Chapter 13 Trustee
P.O. Box 1618
New Bern, NC 28563

Carlos Hernandez-Vivoni
Agent for Specialized Loan Servicing
14841 Dallas Parkway, Suite 425
Dallas, TX 75254

Rhonda Flanagan
4518 Prospect Road
Maxton, NC 28364

This the 5th day of January, 2020.

/s/ Chad W. Hammonds
Chad W. Hammonds
Attorney for Debtor
3410 Capuano Road
Lumberton, NC 28360
(910) 608-3425
State Bar No. 21027